

March 4, 2005

Deepak Joshi
Lead Aerospace Engineer
National Transportation Safety Board
490 L'Enfant Plaza, SW, Room 5235
Washington, DC 20594

RE: NTSB 49 CFR Part 830.2
Notice of Proposed Rulemaking

Dear Mr. Joshi,

While it is understood that the main rotor blades are the lifting surfaces of the helicopter and the tail rotor blades provide anti torque control, their attachment to the helicopter airframe is totally different than an airplane.

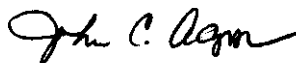
Unlike wings and rudders, which are an intricate part of the airframe and are rarely removed from the aircraft, rotor blades are constantly being removed from a helicopter for various and sundry reasons. Many of the removals are for special inspections caused by abrasions for unknown reasons. Could the result of these inspections be defined as 'substantial damage' if a blade is returned to a repair facility for evaluation and repair? Would the NTSB have to be notified to determine if and when they may investigate?

Many helicopter blades incorporate 'removable, repairable blade tips'. If they have to be removed for whatever reason, will that trigger an NTSB investigation?

There is an old helicopter axiom, "Helicopters are Different from Airplanes", and this is a perfect example. Helicopter blades can be damaged but it does not necessarily cause the airframe and its components to be unairworthy. The damaged blades can be replaced and the helicopter safely flown.

This proposal will do nothing but place additional cost on helicopter operations and contribute absolutely nothing to enhancing aviation safety.

Sincerely,



John C. Agor
President

